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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA :  
: CRIMINAL COMPLAINT  
v. :  
: Mag. No. 19-3490  
ANGEL LUIS GARCIA :  
:  
:

I, Morgan Hughes, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am an Investigator with the U.S. Department of Labor (DOL), Office of Labor Management Standards (OLMS), and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.



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Morgan Hughes, Investigator  
United States Department of Labor  
Office of Labor Management Standards

Sworn to before me and subscribed in my presence,  
November 12, 2019, in Newark, New Jersey



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THE HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**  
**Count One**  
(Embezzling Assets of a Labor Organization)

From at least on or about November 12, 2014, through on or about May 31, 2019, in the District of New Jersey and elsewhere, the defendant

ANGEL LUIS GARCIA

while an officer, that is, Financial-Secretary of Amalgamated Transit Union Local 1614 ("ATU Local 1614"), a labor organization engaged in an industry affecting commerce, did embezzle, steal, and unlawfully and willfully abstract and convert to his own use, and the use of another, moneys, funds, securities, property and other assets of ATU Local 1614 in the approximate amount of \$117,000.

In violation of Title 29, United States Code, Section 501(c).

**ATTACHMENT B**

The basis for my knowledge and for the foregoing charges are, in part, as follows:

1. I have been a Federal Investigator with the Department of Labor-Office of Labor Management Standards (“DOL-OLMS”) for more than 1 year. While with DOL-OLMS, I have participated in numerous financial fraud investigations, including cases involving theft of union funds and embezzlement. I am familiar with the facts and circumstances set forth below from my participation in the investigation of this case, from my personal knowledge, and from my conversations with other law enforcement officers and Officers of Local 1614. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included every fact I have learned during the investigation. Where the actions, statements, and conversations of others are recounted herein, they are related in substance and in part, unless otherwise indicated.
2. In or about September 2019, the United States Attorney’s Office, in the District of New Jersey, (the “USAO”) and DOL-OLMS began conducting an investigation into the activities of ANGEL LUIS GARCIA, the defendant. During the investigation, the USAO and DOL-OLMS have gathered evidence, including but not limited to reviewing financial records, conducting witness interviews and reviewing independent audits. The evidence indicates, among other things, the following:

**BACKGROUND**

3. Amalgamated Transit Union Local 1614 (the “Union”) is a small, independent union of approximately 220 private bus drivers employed by Lakeland Bus Lines, DeCamp Bus Lines, First Transit Bus Service and Warren County Transit Easton Coach Service, in New Jersey. The Union engages in collective bargaining and other representative services on behalf of the membership.
4. In or about the end of 2012, ANGEL LUIS GARCIA, was elected by the membership to serve as the Financial-Secretary for the Union for a term of 3 years. He was re-elected in 2015 and then reelected again in 2018. Each term was for three years. GARCIA ceased acting as Financial-Secretary in or about May 2019. The role of Financial-Secretary was a part-time position.

5. I have spoken directly with a representative from the Union's Executive Board (the "Board") with knowledge, and also reviewed financial documents and a financial audit of the Union authorized by ATU International (the "International") and learned the following:
  - a. Membership dues was deposited into the Union's checking account maintained at Bank of America (the "Checking Account").
  - b. The Union also maintained a credit-card account (the "Union Credit Card") with Bank of America for travel expenditures.
  - c. The Union also maintained a separate fund, which was a savings account maintained at Bank of America (the "Savings Account"), which was closed in or about April 2019.
  - d. The Union maintained a defense fund, which was a savings account maintained at Bank of America (the "Union's Current Savings Account").
6. From on or about January 1, 2014, through on or about May 31, 2019, GARCIA, without Board approval, withdrew approximately \$86,000 from the Union's Checking Account to purchase goods and services from companies, such as Best Buy and Amazon, for his personal benefit and not for the benefit of the union membership.
7. From on or about January 1, 2015, through on or about May 31, 2019, GARCIA, without Board approval, electronically transferred approximately \$5,300 from the Union's Checking Account into his personal bank account. These transfers were for personal reasons and not for the benefit of the membership.
8. From on or about January 1, 2015, through on or about May 31, 2019, GARCIA, without Board approval, withdrew approximately \$15,500 from the Union's Savings Account to purchase goods and services, specifically for mortgage and personal loan repayments. These withdrawals were for personal reasons and not for the benefit of the membership.
9. From on or about January 1, 2015, through on or about May 31, 2019, GARCIA, without Board approval, used the Union's credit card to make purchases of goods and services for personal use, in the amount of approximately \$10,000. These withdrawals were for personal reasons and not for the benefit of the membership.

10. An auditor for the Amalgamated Transit Union International (the "International") conducted a financial audit on the Union. The auditor confirmed that ANGEL LUIS GARCIA, the defendant, had in fact stolen in excess of \$117,000, which GARCIA either transferred to his personal account, or spent on goods and services for his personal use, without Board approval, and not for the benefit of the membership.